

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

DEBORA NOVAKOWSKI,

Plaintiff,

v.

ELAINE CHAO, SECRETARY, and the
UNITED STATES DEPARTMENT OF LABOR,

Defendants.

CIVIL DIVISION

NO. 04-356 ERIE

Judge McLaughlin

Electronically Filed

PLAINTIFF'S MOTION FOR EXTENSION OF TIME
TO COMPLETE DISCOVERY

AND NOW comes the Plaintiff, Debora Novakowski, by and through her counsel John R. Linkosky, Esquire and John Linkosky and Assoc., and files this Motion for Extension of Time to Complete Discovery upon the following statement:

1. On July 29, 2005, this Honorable Court issued a Case Management Order in the within matter providing that the party shall complete discovery on or before September 26, 2005.
2. Defendants' responses to Plaintiff's Interrogatories and Requests for Production of Documents are due September 3, 2005.
3. Similarly, Plaintiff's responses to Defendants' Interrogatories and Requests for Production of Documents are due September 3, 2005.
4. Plaintiff's counsel will be out of the country from September 3, 2005 through September 19, 2005 and will be unable to participate in deposition discovery during that period.
5. The ten days remaining to complete discovery under the current Order will be

insufficient to properly schedule depositions.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court extend the period of discovery to be completed for thirty days to October 29, 2005 and extend all other dates in the existing Case Management Order appropriately as indicated by the attached Case Management Order.

Respectfully submitted,

Date: 9/1/05

/s/ John R. Linkosky
John R. Linkosky, Esquire
Attorney for Plaintiff

Pa. I.D. No. 66011

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CERTIFICATE OF SERVICE

I hereby certify that an original and one copy of the foregoing Motion for Extension of Time to Complete Discovery was delivered by First Class, United States mail, postage prepaid, on the 1st day of September, 2005, to the following:

Paul E. Skirtich, Esquire
Assistant U.S. Attorney
United States Department of Justice
U.S. Post Office & Courthouse
700 Grant Street, Suite 400
Pittsburgh, PA 15219

/s/ John R. Linkosky
John R. Linkosky, Esquire
Attorney for Plaintiff